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Chapter 11 Trustee

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA - SANTA ANA DIVISION

In re

THE LITIGATION PRACTICE GROUP P.C,

Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

TRUSTEE'S NOTICE OF INTENT TO  
ABANDON ESTATE'S INTEREST, IF  
ANY, IN CERTAIN ASSETS LOCATED AT  
OFFICES IN KIRKLAND, WA 98033

[Pursuant to 11 U.S.C. § 554(a) and LBR  
6007-1]

TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY COURT  
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, ALL CREDITORS, AND OTHER  
INTERESTED PARTIES:

**PLEASE TAKE NOTICE** that Richard A. Marshack, the duly appointed, qualified and  
acting Chapter 11 Trustee ("Trustee") of the Bankruptcy Estate ("Estate") of The Litigation Practice  
Group P.C. ("Debtor"), intends to abandon the Estate's interest, if any, in property of the Estate as  
detailed below, pursuant to 11 U.S.C. § 554(a) and Local Bankruptcy Rule ("LBR") 6007-1, without  
further Court order:

**ASSETS TO BE ABANDONED**

Prior to bankruptcy, on or about September 20, 2022, Debtor entered into an Office Lease  
("Lease") with Lakeview 6725, LLC ("Landlord") with regard to the office building 6725 116th  
Avenue NE, Ste. 160, Kirkland, WA 98033 ("Premises"). On November 6, 2023, as Dk. No. 632,  
Trustee filed a stipulation for return of possession of the Premises after rejection of the Lease

1 (“Stipulation”). On November 7, 2023 as Dk. No. 640, the Court entered an order approving the  
2 Stipulation.

3 As described in the Stipulation, there remains personal property left at the Premises including  
4 printers, furniture and other office items (“Personal Property”). Trustee has determined the Personal  
5 Property value is burdensome and of inconsequential value to the Estate and not worth trying to  
6 reclaim, store and sell. Accordingly, Trustee believes it is in the best interest of the Estate to abandon  
7 the Estate’s interest, if any, in the remaining Personal Property. Thus, pursuant to LBR 6007-1(a),  
8 Trustee seeks to abandon any interest in the Personal Property.

9 PLEASE TAKE FURTHER NOTICE that any response and request for hearing as to the  
10 proposed abandonment must be in the form as required by Local Bankruptcy Rules 9013-1(f) and (o)  
11 and filed with the Clerk of the above-entitled Court. The deadline for any response and request for  
12 hearing is 14 days after the date of service of this Notice, plus an additional 3 days unless this Notice  
13 was served by personal delivery or posting as described in F.R.Civ.P. 5(b)(2)(A)-(B). A copy of any  
14 response or request for hearing must be served on Richard A. Marshack at the address indicated  
15 above and served on the Office of the United States Trustee, 411 W. Fourth Street, Suite 7160, Santa  
16 Ana, CA 92701.

17 Failure to timely respond may be deemed as acceptance of the proposed abandonment. See  
18 Local Bankruptcy Rules 6007-1 and 9013-1(h). As such, if no such objection or request for hearing  
19 is served and filed within the seventeen (17) day period, the Trustee will proceed with the  
20 abandonment on or after the eighteenth (18th) day after service of this Notice. Plainly put, if no  
21 timely objection and request for hearing is filed and served, the Personal Property shall be deemed  
22 abandoned without further order of the Court.

23 DATED: November 24, 2023

Respectfully Submitted,

24 By: /s/ Richard A. Marshack  
25 RICHARD A. MARSHACK  
26 Chapter 11 Trustee  
27  
28







## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:  
870 Roosevelt, Irvine, CA 92620.

A true and correct copy of the foregoing document entitled: **NOTICE OF INTENT TO ABANDON PERSONAL PROPERTY** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 23, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:** On **November 27, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**DEBTOR – MAIL REDIRECTED TO TRUSTEE**

THE LITIGATION PRACTICE GROUP P.C.  
17542 17TH ST  
SUITE 100  
TUSTIN, CA 92780-1984

☐ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL:** Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 27, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**VIA EMAIL:**

INTERESTED PARTY  
WELLS FARGO BANK, N.A. AS AGENT FOR  
LAKEVIEW 6725, LLC  
C/O ED LUKAS, VICE PRESIDENT  
[ed.lukas@wellsfargo.com](mailto:ed.lukas@wellsfargo.com)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

November 27, 2023  
Date

Pamela Kraus  
Printed Name

/s/ Pamela Kraus  
Signature

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): CONTINUED:**

- **Eric Bensamochan** eric@eblawfirm.us, G63723@notify.cincompass.com
- **Peter W Bowie** peter.bowie@dinsmore.com, caron.burke@dinsmore.com
- **Ronald K Brown** ron@rkbrownlaw.com
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- **Richard A Marshack (TR)** pkraus@marshackhays.com, rmarshack@iq7technology.com; ecf.alert+Marshack@titlexi.com
- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; kfrederick@ecf.courtdrive.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com

**2. SERVED BY UNITED STATES MAIL:** continued:

**20 LARGEST CREDITOR**

ANTHEM BLUE CROSS  
ATTN: OFFICER, A MANAGING OR  
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KENTFIELD, CA 94904-1476

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**RTD 05/30/23 UTF**

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WINTHROP GOLUBOW HOLLANDER  
LLP  
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NEWPORT BEACH, CA 92660

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IRVING, TX 75061-3414

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**RTD 10/03/23 UTF**

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99 WALL STREET, STE 2669  
NEW YORK, NY 10005-4301

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MC DVI FUND 1, LLC; MC DVI FUND 2,  
LLC  
C/O GARRICK A HOLLANDER  
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C/O PAUL R. SHANKMAN, ESQ  
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1530  
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